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ABF Freight System, Inc.
3801 Old Greenwood Road
Fort Smith, AR 72903

January 14, 1999

Docket Clerk
Department of Transportation
400 Seventh Street, SW., Room PL-401
Washington, DC 20590

Re: Comments in Docket BTS-98-4659
[Submitted through the Internet – DMS]

Dear Sir or Madam:

ABF Freight System, Inc. (ABF) is a motor carrier of general commodities headquartered in Fort Smith, Arkansas, with 1998 annual revenues over \$1 billion. Our company provides service to about 100,000 customers through more than 300 facilities in all 50 states, Canada, Mexico and Puerto Rico. ABF employs approximately 14,750 people and operates about 4,300 trucks. My position with ABF is Vice-President of Marketing & Pricing, and I am authorized to offer these comments on behalf of ABF.

In the referenced matter, the Bureau of Transportation Statistics (BTS) has proposed changes to the reporting requirements for motor carriers. Generally, we support the simplification and reduction of the required information. However, we recommend retention of certain data elements that would be eliminated, as follows:

1. Form M. We would prefer retention of total expenses by functional category, in Form M-1, Schedule 500 (e.g., Total, Line-Haul, Pickup&Delivery, Billing&Collecting, Platform, Terminal, Maintenance, and All Other) at least in the annual report. Alternatively, we would support a summary of employees, compensation and hours/miles by employee grouping (e.g., linehaul, PUD, clerical, maintenance). We agree that the matrix of expenses by category and line item is not needed, but the totals for each should be maintained so that carriers might benchmark costs against comparable companies. The public interest is served by providing information that encourages cost reductions, which are invariably passed along in the form of lower prices.

2. Form QFR. The proposed quarterly form has been severely reduced, and the resulting form offers almost no useful information. The existing QFR form is compiled with information maintained for other internal purposes and is not burdensome to prepare. With the possible exception of page 3 [lines 45 through 58], the existing QFR should be retained.

As an absolute minimum, it is essential that quarterly statistics be available for (a) miles and ton-miles, by highway and intermodal [lines 63 through 66], and (b) revenue, weight and shipments, by truckload and less-than-truckload [lines 74 through 79]. The quarterly reports are the only source of reliable, current information on motor carrier intermodal activity, which is calculated from the miles and ton-miles statistics. Shipments, weight and revenue data are the basic statistics by which shippers, carriers, academia and others evaluate changes in the motor carrier industry. With the bifurcation of the motor carrier industry into TL and LTL companies, the data separation on shipments above and below 10,000 pounds allows comparisons on an “apples to apples” basis.

The timely availability of this information is pro-competitive, by allowing the public to monitor the profile of motor carriers. Markets, including the motor carrier industry, operate most efficiently in the light of adequate competitive information. Numerous studies in academic journals and by individual shippers stem directly from these essential profile statistics, from which are derived performance measurements, such as average length of haul, average load, average shipment size, and average shipment cost. Carrier systems are already programmed to provide this information, which is also maintained in the normal course of business. Without this essential data, shippers would have diminished ability to compare carriers, and carriers would have less incentive to benchmark their operations in order to strive for continuous improvement and responsiveness to consumer demand.

We appreciate the opportunity to offer these comments and request that the above-listed data elements be maintained.

Respectfully submitted,

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